



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

March 17, 2015

Tamara Gretsches, BLM National Project Manager  
Boardman to Hemingway Transmission Line Project  
PO Box 655  
Vale, Oregon 97918

Dear Ms. Gretsches:

We have reviewed the Bureau of Land Management's December 2014 Draft Environmental Impact Statement and Land-use Plan Amendments for the Boardman to Hemingway Transmission Line Project. (EPA Region 10 Project Number: 08-055-BLM).

Our review was conducted in accordance with the EPA's responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the DEIS prepared for the proposed action considers expected environmental impacts and the adequacy of the EIS in meeting procedural and public disclosure requirements of the NEPA.

**EPA DEIS rating**

We are rating the DEIS Environmental Concerns – Adequate (EC-1). We are rating the DEIS EC-1 because we believe environmental impacts can be further avoided and minimized through the co-location of the Boardman to Hemingway Transmission Line with other transmission lines.

**Project summary**

The DEIS analyzes the impacts related to granting a right-of-way across federal land to the Idaho Power Company for the purpose of constructing, operating, and maintaining the Boardman to Hemingway Transmission Line Project. The B2H Project would include a single-circuit alternating-current, 500-kilovolt (kV) overhead electric transmission line with ancillary facilities. The transmission line would be approximately 305 miles long, and would connect the Grassland Substation located near the city of Boardman, Morrow County, Oregon, to the existing Hemingway Substation near the city of Melba, Owyhee County, Idaho.

**Responsiveness to the EPA's input**

The EPA has provided written comments and participated in cooperating agency meetings for the B2H Project since 2008. Here we note several areas where your DEIS shows responsiveness to our input, which we appreciate.

Your information on "Alternatives to Transmission Line Construction" communicates important efforts to avoid the need for transmission lines. Efforts to avoid the need for transmission lines are important because transmission lines, such as the Boardman to Hemingway transmission line, will cause high,

long-term adverse effects to wildlife; cultural and historic resources; and visual and vegetation resources.

Your decision to identify the environmentally preferred alternative in the DEIS goes above and beyond the requirements of the Council on Environmental Quality regulations for implementing the NEPA. We applaud this decision and believe identifying the environmentally preferred alternative as soon as possible helps to sharply define the issues and provide a clear basis for choice by the decision-makers and the public. We are also pleased to see that the Agency Preferred Alternative is the same as the Environmentally Preferred Alternative.

We also note our appreciation for the substantial efforts of the BLM, U.S. Fish and Wildlife Service, U.S. Forest Service, U.S. Bureau of Reclamation, Bonneville Power Administration, Idaho Governor's Office of Energy Resources, Idaho Fish and Game, Oregon Department of Fish and Wildlife, and the Idaho Power Company in the development of the Draft Framework for Development of Compensatory Mitigation Plans for Biological Resources<sup>1</sup> and the Greater Sage-Grouse Mitigation Blueprint.<sup>2</sup> Information in the Framework and Blueprint will help guide effective mitigation planning.

### **Co-locating the Boardman to Hemingway Transmission Line**

We are pleased to know that the BLM is engaged in a process to avoid and minimize adverse impacts through the co-location of the Boardman to Hemingway Transmission Line with other transmission lines; consistent with the Western Electricity Coordinating Council's newer 2012 250-foot separation distance guidance.

We strongly encourage the BLM to pursue this effort to the maximum extent possible because we believe meaningful environmental benefits would be a likely result. Environmental benefits from transmission line co-location appears to be the case for the Vantage to Pomona Heights Transmission Line and Gateway West Transmission Line Projects. For Vantage to Pomona Heights, the BLM's January 2015 Supplemental DEIS includes new alternatives which are 19-26 miles shorter than the DEIS's 66 mile Agency Preferred route. For Gateway West, the BLM's September 2014 Notice of Intent to prepare a Supplemental DEIS includes a new proposed route 250 feet from an existing line for 28.7 miles. This co-location will allow the Applicant to use existing roads beneath the existing 500 kV transmission line.

Constructing shorter transmission lines and using existing roads facilitates the avoidance and minimization of many typical effects of high-voltage transmission lines on lands and resources, including: displacement of some land uses, noise, electromagnetic and visual impacts, habitat fragmentation and displacement of wildlife, and effects to soil and water resources.

### **Mitigation**

To help ensure the Final Compensatory Mitigation Plans adequately protects species and habitats, we recommend that the Final Framework for Development of Compensatory Mitigation Plans for Biological Resources include additional information detailing how the lead agencies intend to consider input on non-listed species from state and federal fish and wildlife agencies.

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<sup>1</sup> DEIS, Appendix D

<sup>2</sup> DEIS, Appendix E

### **Noxious weeds**

To adequately protect the environment from the spread of noxious weeds which may occur in Idaho Power Company's right-of-way as a result of their activities, we recommend that the FEIS include additional information relating to Design Feature OM-8.

If noxious-weed species occur within IPC's right-of-way as a result of IPC activities, IPC would coordinate treatment with the BLM, USFS, or other land owners as applicable. Treatments would be in compliance with BLM and USFS land use plans and guidance. When determining whether treatment is necessary and whether it would produce the desired results, IPC would consider surrounding site conditions and whether weed-control activities would be conducted by other parties. IPC is only responsible for controlling noxious weeds to pre-disturbance levels.<sup>3</sup>

#### *Recommendations:*

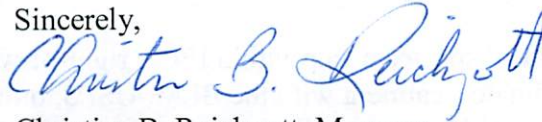
- We recommend that the FEIS describe the meaning of "...result of IPC activities". We believe that IPC's responsibility for noxious weeds in the right-of-way should be interpreted broadly. IPC should consider, for example, that weeds spread by private citizens illegally using Project-related roads and ROW areas are indirect impacts of the Project; they are a result of IPC activities.
- We recommend that the FEIS edit or explain what is meant by, "...IPC would consider...whether weed-control activities would be conducted by other parties." The Design Feature should be clear about IPC's responsibility to control noxious weeds. We are concerned that considering whether control activities would be conducted by others could be a means of postponing IPC efforts.
- We recommend that the FEIS elaborate on pre-disturbance levels. When and how will pre-disturbance levels be determined by IPC? And, what is the post-disturbance monitoring process for ensuring that weeds are kept below pre-disturbance levels?
- Given the Proposed Action's potential contribution to major long-term adverse cumulative effects of noxious weeds in the Project's geographic area of influence, we recommend that the FEIS delete the word "only" from OM-8. Simply stating that IPC is responsible for controlling noxious weeds to pre-disturbance levels is more in line with the spirit of environmental protection given the cumulative effect context for noxious weeds in the area.

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<sup>3</sup> DEIS, p. C-17

Thank you for this opportunity to comment and if you have any questions please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the last name being the most prominent part.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. EPA Rating System for Draft Environmental Impact Statements

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.